

# FSC™ CERTIFICATION SYSTEM

## FOREST MANAGEMENT CERTIFICATION SURVEILLANCE AUDIT n°1 Public REPORT

Report finalisation date: 22 May 2019

Washington State Department of Natural Resources:  
South Puget HCP Planning Unit

*Contact Person: Douglas Kennedy, Forest Certification Program Manager  
(Douglas.Kennedy@dnr.wa.gov)*

Forest location(s): USA, Washington

Certificate registration code: BV-FM/COC-080501

Date of issue: May 14, 2018

Date of expiry: May 13, 2023

Main Evaluation:	31 October 2017
Surveillance 1	8-11 October 2018
Surveillance 2	Day Month Year
Surveillance 3	Day Month Year
Surveillance 4	Day Month Year

## BUREAU VERITAS CERTIFICATION

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## 1 - Description and background of the applicant forest entity

### 1.1 - General description and identification

Forest Management company			
<b>Name</b>	Washington State Department of Natural Resources		
<b>Address</b>	1111 Washington St. SE, MS 47014 Olympia, WA 98504-7016		
<b>Telephone</b>	360-902-1283		
<b>E-mail</b>	Douglas.kennedy@dnr.wa.gov		
<b>Web site</b>	www.dnr.wa.gov		
<b>Commissioner of Public Lands</b>	Hilary Franz		
<b>Contact person (responsible) for FSC certification</b>	Douglas Kennedy		
<b>FSC trademark responsible</b>	Douglas Kennedy		
<b>Activity</b>	forest management only		
<b>Annual turnover:</b>	\$ 23,117,579.48 USD		
<b>Category of forest management</b>	Natural Forest		
<b>Number of forest workers (including contractors):</b>	Forest field activity	148 (male)	43 (female)
	Administrative/office activity	29 (male)	30 (female)
	Industrial and transformation process (if relevant)	Number (male)	Number (female)

The Washington State Department of Natural Resources (DNR) manages state forest lands for a variety of public trusts which fund state-wide school construction, universities, state institutions, and county services. Forest management is directed by the Policy for Sustainable Forests, and DNR's Habitat Conservation Plan (HCP), which is a contractual agreement with the Federal Services (United States Fish & Wildlife Service (USFWS) and National Oceanic and Atmospheric Administration (NOAA)) to provide conservation benefits to threatened and endangered species within the range of the northern spotted owl, which include DNR-managed forested state trust lands within the western part of the State as well as lands on the east slopes of the Cascade Range.

The DNR carries out the planning and implementation of forest management activities through a hierarchy of planning processes. Forest operations (e.g. harvest, renewal, tending) are carried out by contractors. Almost one hundred percent of timber sales are awarded through a competitive bidding process, with a portion being directly contracted to local (usually) smaller contractors. Contractors must meet specific qualification criteria for training and performance. Washington State has one of the strictest Forest Practices Acts in the United States, which dictates how forestry activities can be carried out.

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## 2 - Scope of certificate

### 2.1 - Certification application type and description of FMU(s)

#### 2.1.1 - Certificate

	Single FMU	Multiple FMU	Group
Normal Certificate	yes		
Small SLIMF Certificate			
Low intensity SLIMF Certificate			

#### 2.1.2 - Description of FMUs

Classification	Number of FMUs	Total forest area (ha <sup>1</sup> )			
		Privately managed	State managed	Community managed	Total
Less than 100 ha in area					
100 – 1000 ha in area					
1000 – 10 000 ha in area					
More than 10 000 ha	1		71,311 (176,207 acres)		71,311 (176,207 acres)
Meeting the eligibility criteria as SLIMF					
<b>TOTAL</b>	<b>1</b>		<b>71,311 (176,207 acres)</b>		<b>71,311 (176,207 acres)</b>

<sup>1</sup> 1 inch = 2,54 centimeters ; 1 foot = 0,3048 meters ; 1 yard = 0,9144 meters and 1 mile = 1,609344 kilometers

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## 2.2 - Product categories and main commercial timber:

List of Timber Product Categories available for sale as FSC-certified products				
Trade Name	Species (botanical name)	Product Type/ Nature (round wood, pulpwood,...)	Selling mode	FSC product claim
<b>Round wood logs</b>	Thuja plicata Callitropsis nootkatensis Tsuga mertensiana Tsuga heterophylla Pseudotsuga menziesii Abies grandis Abies procera Abies amabilis Pinus contorta Pinus monticola Picea engelmannii Picea sitchensis Taxus brevifolia Alnus rubra Fraxinus latifolia Betula papyrifera Prunus emarginata Populus trichocarpa Crataegus douglasii Arbutus menziesii Acer glabrum Acer macrophyllum Quercus garryana Salix species	<b>Round wood logs W1.1</b>	<b>FOB</b>	<b>FSC 100%</b>
<b>Other non-timber forest products</b>	<u>Boughs:</u> Thuja plicata Pinus monticola Abies grandis Abies procera Pseudotsuga menziesii <u>Brush:</u> Vaccinium ovatum Vaccinium parvifolium Gaultheria shallon Polystichum munitum Rhamnus purshiana	<b>Conifer boughs, brush N10</b>	<b>FOB</b>	<b>FSC 100%</b>

The State sells roundwood logs either on the stump or harvested under contract, with the vast majority being stumpage sales. The primary species include: Douglas Fir (Pseudotsuga menziesii), Western Red Cedar (Thuja plicata), Western Hemlock (Tsuga heterophylla), Pacific Silver Fir (Abies amabilis), Noble Fir (Abies procera) and Red Alder (Alnus rubra). The State also sells the harvest rights for conifer boughs and brush from a variety of tree and shrub species but does not market these products with FSC claims.

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### 3 - Description of evaluation

#### 3.1 - Composition of the audit team

Evaluation Team (main assement)	Notes and CV ( <i>put CV in appendices and sum up the notes from previous audits</i> ) of team member	MA ( <i>fulfill with cross in the relevant column</i> )	AS1	AS2	AS3	AS4
Team Leader	Brian Callaghan	X				
Auditor 1	Sarah Bros	X	X			
Auditor 2	Craig Howard	X				
Auditor 3	Jim Colla		X			
Local Specialist (Forester and ecologist)	Richard Boitnot	X				

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### 3.2 - Description of the audit program.

#### 3.2.1 - Surveillance audit schedule and last survey audit schedule

SURVEILLANCE n° SV1 AUDIT SCHEDULE			
Team	Time	Detailed visited sites	Check point, Field assessment activity and justification of the selection of the points monitored and on-sites visits performed
<b>- Monday, October 8th, 2018</b>			
Bros	9 :00 am	Washington DNR office, Olympia	Opening meeting of the audit in presence of Douglas Kennedy, Hannah Yourd
Bros	9:20 am	Washington DNR office, Olympia	Document review/stakeholder interviews/finalize site visits/DNR presentations
Bros	16:30 pm	Washington DNR office, Olympia	Daily debrief
<b>Tuesday, October 9th, 2018</b>			
Bros, Colla	7:00 am	Gather at DNR office, Olympia	Field visits
Bros, Colla	7:30 am	Depart for field	Colla visit to Black Diamond Bros visit to Snoqualmie
Bros, Colla	17:00 pm	DNR office	Daily debrief
<b>Wednesday, October 10th, 2018</b>			
Bros, Colla	7:00 am	Gather at DNR office, Olympia	Field visits
Bros, Colla	7:30 am	Depart for field	Colla visit to Belfair Bros visit to Elbe
Bros, Colla	17:00 pm	DNR office	Daily debrief
<b>Thursday, October 11th, 2018</b>			
Bros, Colla	8:00 am	DNR office, Olympia	Document review and interviews/ compile findings
Bros, Colla	11:00 am	DNR office, Olympia	Closing meeting Present findings to Douglas Kennedy, Hannah Yourd, discuss next steps, confidentiality and appeals

Statement of the total person days spent for assessment:

activity	Nb of man/day
Pre-evaluation or preparatory work	0.5
Audit activity on field	7.5
Stakeholder consultation	0.5

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Report writing	1.5
<b>TOTAL</b>	<b>10</b>

**3.2.2 - Clear description of the sampling system employed to select FMUs  
or sites for evaluation and RATIONALE for their selection**

During the audit 26 sites covering a range of activities were selected for visit by the auditors. Sites visited, and activities observed included, but were not limited to, active harvest, regenerated units, water management areas, commercial harvests, public activities, wildlife management zones, Endangered Species Act conformance, and road infrastructure. The table below highlights the activities observed at the sites visited, and discussions during the audit.

Date	Auditor	Site No.	Comments
09-Oct	Bros	Tiger Mountain	VRT harvest; leave 8 trees/ac residual or in clumps; work with biologists to design cutover to mimic fire behaviour
09-Oct	Bros	Long Cut	viewed riparian reserve; block harvested decades ago right to stream; recent harvest 2015 (83 acres); discussion of riparian forest restoration work; discussion of trail closures due to forest operations; viewed 3 culverts
09-Oct	Bros	Long Cut	harvest 2015; discussed landowner issues around use of herbicides due to adjacent bee farmer;
09-Oct	Bros	Fern Hopper	2017 harvest (72 acres); paragliding club recreation easement adjacent to sale ; interviewed club President
09-Oct	Bros	King	viewed fish passage culvert; cultural values stream; discussion on collaboration with Tribe biologist for culvert; viewed recent plant 2018; discussion on surveys, veg management, invasive species
09-Oct	Bros	West Tiger Com site	communication lease; big revenue generator
09-Oct	Bros	Murelet habitat	walked into murelet habitat (RTE species); demonstration of murelet habitat tool
09-Oct	Colla	West McDonald Communications Site	Partnership with City of Tacoma to build a new road and abandon an old road to a cell tower site. New tower provides coverage with City of Tacoma watershed. Road works well done and stable
09-Oct	Colla	Howard Hansen Dam	Land ownership within Green River watershed requires extensive cooperation between landowners. Interagency Agreement between DNR and City of Tacoma for road uses including co-op on maintenance expense. No public entry or use as it is a municipal watershed (HCVF). Chemical use very limited, all is heavily monitored by City of Tacoma



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09-Oct	Colla	Gale Force VRH, U3 FMA: 280208	Active variable retention harvest unit by combination of traditional line logging, tethering and shovel. Unit has landslide risk assessment, Rain on snow prescription, Riparian management zone, Wetland management zone. Logging crew had all required PPE, spill kits, first aids kits, emergency response and communication plan. Contractor is well verse in all requirements and keeping up on BMP work, protecting groups and dispersed retention from skidding damage, and monitoring haul conditions with the wet weather.
09-Oct	Colla	Mid Tsuga Lake RMAP/Angry Grouse Rd	2012 DNR acquisition which needed additional RMAP work; various culvert works at stream crossings. Good install in a stable configuration. RMAP work is winding down.
09-Oct	Colla	Double Span, U2 Potentially Active Road Work FMA: 249659	Improvements and upgrades on an old road to construct/reconstruct by install/replace relief culverts, spot rock and grade. At two culvert crossings, fills were starting to erode and sediment has or will enter non-fish channel. Observation issued. Operation was shut down at the time of inspection due to wet conditions
09-Oct	Colla	Connector Road	400' of new road completed by DNR road crew; constructed on Muckleshoot Indian Tribe ownership under Road Use Permit; provides a gateway to other DNR ownership. Road in a stable configuration.
10-Oct	Bros	Nutty Buddy, Unit 1	harvest 2014 (69 acres); SIP + Planted Df + Ce mix in 2017; discussion on creation of snag trees in potential Spotted Owl (RTE) habitat w/in riparian reserves or residual clumps; discussion of prey for Spotted Owl (flying squirrel); discussion on regen management;
10-Oct	Bros	Snickers, Unit 1	current VRH harvest; B&M logging contractor; timber sale lump sum to Hampton mill; interviewed forest workers; discussion of H&S, work conditions, training, loggers certification, communication, working with DNR, BMPs, EMS; discussion of Cliff Protection Procedure & Peregrine falcon habitat protection; discussed extreme hazard abatement, wood sale contracts
10-Oct	Bros	Benny Beaver, Unit 4	VDT & VRT harvest 2017 (95 ac); habitat enhancement & riparian enhancement; viewed Alan Mainwaring's murrelet habitat tool; discussion on identification of murrelet habitat
10-Oct	Bros	Heckenpeck, Unit 3	VRH harvest 2017 (18 acres); discussion of landowner issue with aesthetics & buffer left; viewed road construction; discussion of public use & firearms; roads gated to public access
10-Oct	Bros	Elbe Hills CT, Unit 1	viewed active harvest; discussion on recreational ATV use in area; discussion on movement of parking lot (1 acre) for safety & movement of campsite (6 acres) due to RTE habitat;
10-Oct	Bros	Fortune, Unit 4	PCT (41 acres); viewed thinning results; discussion on utilization of thinnings; site history; recreation use of area

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10-Oct	Bros	Sahara Horse campground	Ck	met with Washington Conservation Corps Program (WCC) Coordinator and students; interviewed students; discussed program goals, objectives, interaction with DNR
10-Oct	Colla	Pyrite, Unit 1		66 acres unit not yet started; contains wetland and riparian management zones; Potentially unstable slopes; Cultural resource consultation; the Tin Mine Trail will need to be closed. Set asides well buffered and flagged, road marked, hikers using at the time of the audit.
10-Oct	Colla	Cougar, Units 1 and 2		Completed unit awaiting road decommissioning and stream rehabilitation. Roads works not active at the time of the audit. Both units, and others observed in the area had a large number of unburned slash piles present. Due to smoke and air quality restrictions, the SPS Unit does not conduct prescribed fire or pile burning operations. This has resulted in a fuel build up and added fire risk to adjacent lands. The piles on the landscape do not represent a natural condition. Internal informal discussion within DNR is ongoing with respect to limited reintroduction of pile burning, this likely needs a more formal review. Observation issued.
10-Oct	Colla	Winch, Units 2 and 3		Planting site preparation: site preparation map, contract, award letter, certificate of insurance, farm labor license, spray records reviewed. No evidence of overspray; all done by hand application. Also, the site of 4x4 big trucks designated trail and use area, right through the unit. The club president was very complimentary of DNRs efforts to meet the needs of his group.
10-Oct	Colla	Second Chance, Unit 2		Recently completed post-haul maintenance and road abandonment; road works in good shape; wetlands and riparian management zones were protected. Excellent communication with adjacent landowners to mitigate their concerns.
10-Oct	Colla	Twin Goats, Unit 3		Planting site preparation: site preparation map, contract, award letter, certificate of insurance, farm labor license, spray records reviewed. No evidence of overspray; all done by hand application. Public outreach to notify of trail closure. Also reviewed install of a 30' Horse Camp bridge; pre-fab on eco-blocks; good install, no evidence of erosion, site stable.
10-Oct	Colla	Oak Patch NAP		This 17-acre site preserves an Oregon white oak woodland and an Oregon white oak-Douglas-fir mosaic which is extremely unusual on the Kitsap Peninsula and represents a vanishing woodland community in the Puget Trough. Spring wildflowers such as fawn lilies, chocolate lilies, and camas lilies thrive on this site, along with populations of the Puget fritillary and Shelton pine elfin butterflies, and the western toad. Burning is an important tool to maintain the habitat. Reviewed site brochure, nearby area was active with recreationists at the time of the audit.

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**3.3 - Interview and stakeholders input and treatment.**

**3.3.1 - Interview(s) of involved people met during audit.**

Involved people (contracted by the company)			MA	AS1	AS2	AS3	AS4
category	name	Position					
Owner							
Manager							
Employee(s):	Douglas Kennedy	Forest Certification Program Lead	X	X			
	Hannah Yourd	Forest Certification Specialist	X	X			
	Andy Hayes	Division Manager	X				
	Allen Estep	Assistant Division Manager - HCP and Scientific Consultation	X	X			
	David Bergvall	Assistant Division Manager - Forest Informatics & Planning	X				
	Calvin Ohlson-Kiehn	Assistant Division Manager - Silviculture	X	X			
	Kristen Ohlson-Kiehn	Assistant Division Manager - Planning	X				
	Mike Buffo	Environmental Planner	X				
	Sara Palmer	State Lands Archeologist	X	X			
	Darin Cramer	Division Manager - Product Sales & Leasing	X				
	Koshare Eagle	Assistant Division Manager - Product Sales		X			

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	Brock Milliern	Division Manager - Conservation, Recreation, and Transactions	X				
	John Gamon	Assistant Division Manager - Natural Areas/Natural Heritage	X				
	Tim Stapleton	Assistant Division Manager - Recreation	X				
	Alex Nagygyor	Assistant Division Manager - Engineering Division - Roads Section	X				
	Jeff Ricklefs	Forest Inventory Program – Forest Resources Division		X			
	Scott Sargent	South Puget Sound Region Manager	X	X			
	Dean Adams	State Lands Assistant Region Manager - Product sales, Land management, Engineering	X	X			
	Laurie Benson	Assistant Region Manager - Asset management, Recreation, Natural Areas	X	X			
	Brian Williams	Intensive Management Forester - South Puget Sound Region	X	X			
	Dave Gufler	Intensive Management Forester - South Puget Sound Region	X				
	Alan Mainwaring	Wildlife Biologist - South Puget Sound Region	X	X			
	Keith Yonaka	South Puget Sound Region Engineer	X	X			
	Ted Keeley	District Manager - Rainier District	X				
	Lee Roach	District Manager -Rainier District	X	X			
	Joe Chavez	Recreation Manager - Rainier District		X			
	Brandon Mohler	Forest Manager - Elbe Unit	X				

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	Nancy Barker	Recreation Manager - Elbe Unit	X				
	Michelle Bell	Engineer - Elbe Unit	X				
	Andrew Reed	Forest Manager – Elbe Unit		X			
	Kevin Carlsen	Forester - Elbe Unit	X	X			
	Mike Fowler	Forester - Elbe Unit	X				
	Craig Higbee	Forester - Elbe Unit	X				
	Andy Aschenbrenner	District Manager - Hood Canal District		X			
	Nathan McReynolds	Forest Manager - Belfair Unit	X	X			
	Katie Woolsey	Natural Areas Manager		X			
	Jesse Sims	Recreation Manager - Belfair and Hood Canal Units	X				
	Ray Minish	Recreation Forester - Belfair Unit	X				
	Eric Haggstrom	Recreation Manager - Belfair and Hood Canal Units		X			
	Bill Heymann	Engineer - Hood Canal District		X			
	Andy Ritter	Forest Manager - Delphi Unit	X				
	Phil Wolff	Recreation Manager - Delphi Unit	X				
	Kristen Bloomfield	Forester - Delphi Unit	X				
	Tyler Traweek	Unit Manager - Black Diamond Unit	X	X			
	Daniel Eide	Rights of way Manager - Black Diamond Unit	X	X			
	Justin Gardiner	Unit Engineer - Black Diamond Unit		X			
	Jacob Conklin	Forester – Black Diamond Unit		X			
	Jarrod Kaiser	Watershed Manager - Tacoma Water		X			
	Brian Ballard	Forester - Tacoma Water		X			
	Susan Seaberg	Engineer – Rainier District		X			

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	Maureen Crabtree	Intensive Management Forester - Pacific Cascades Region - Lewis District	X				
	Jacob Oberlander	Forester - Three Corner Rock Unit	X				
	Paul Footen	Forester - Snoqualmie Unit		X			
	Sam Jarrett	Recreation Manager - Snoqualmie Unit		X			
	Eric Bauer	Engineer - Snoqualmie Unit		X			
Sub contractors:		B&M Logging - loader operator		X			
		B&M Logging - trucker		X			
		WCC crew - Supervisor		X			
		WCC crew -		X			

**3.3.2 - Stakeholders identification and consultation process**

**3.3.3 -** Stakeholders were first identified and were formally consulted prior (Sept 14 2017) to the recertification audit. The stakeholder list has been updated to reflect name changes of various members as appropriate.

**3.3.4 - Record of stakeholder received comments or complaints**

Stakeholders reference (name / type)	date	Received comment or complaints	Theme (social, economy, environment)	Checked on site (YES or NO)	Answer from the certificate holder	Answer from Bureau Veritas
Institutions/individuals informed about the evaluation						
		None				
Individuals who were interviewed						
Northwest Paragliding Club	Oct. 9.2018	Positive response to questions re: working with DNR	Recreation (social)	Yes	Adjusted harvest to accommodate for safety reasons.	
Washington Conservation Corps Program	Oct. 10. 2018	Positive response to questions re: working with DNR	Recreation (social)	Yes	Accommodate wherever possible as is a worthwhile program.	
Individuals who contributed information in writing						
None.						

**3.4 - Other evaluation techniques**

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None.

## 4 - Update about any changes to the scope of the certificate

There have been no changes in:

- Legal & Administrative context
- Land use
- Ownership and Use Rights
- Forest Composition
- HCVFs & RTE species
- Commercial Products
- Forest Management or
- Timber traceability.

### 4.1 - Use of chemicals

Chemical pesticide name	Active ingredient of the chemical product	Reason for use	Approximate quantity used / year	Size of area treated annually
None.			0 liter, m3 tonnes	0 ha

Washington DNR uses a variety of chemicals to control competing vegetation in regenerated sites and as a site preparation tool prior to regeneration. In FY2018 DNR did not use pesticides for controlling competing vegetation or for site preparation. In FY2017 DNR did conduct hand pull and cut, a technique used to control the noxious weed Scotch Broom (*Cytisus scoparius*), on 331 hectares. Figure 1 is an example of auditor observations of how invasive this noxious weed can be.



Figure 1: example of Scotch Broom competing with planted trees.

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**4.2 - Number of accidents in forest work (serious/fatal) since the last audit**

There have been no serious accidents or fatalities involving either State employees or its contractors over the past year.

**5 - Standard**

	Ref / n° management FSC national standard	Ref / n° checklist	Other documents if relevant
Main assessment	FSC FM Standard for US v1.0, 2010	SF03 FSC FM US checklist rev 2.2, 2017	FSC-STD 40-004 FSC-STD 20-007
Surveillance 1	FSC FM Standard for US v1.0, 2010	SF03 FSC FM US checklist rev2.2, 2017	FSC-STD 40-004 FSC-STD 20-007 FSC-STD 30-001a FSC-STD 40-005 V3-1
Surveillance 2			
Surveillance 3			
Surveillance 4			

**6 - Observation**

**6.1 - Documents review**

Administrative and legality (taxes, land use rights, etc.)

- South Puget, HCP Planning Unit Forest Land Plan Final EIS
- Timber Sale Contract Clause and Administration Manual.
- Silviculture Contract Templates
- Forest Land Planning Public Process Example: SPS Scoping: Local Knowledge / Stakeholder workshops

Internal social issues (accident records, safe and safety policies, trainings records, etc.)

- *DNR agency-wide safety survey*
- Safety and Health Policy (2017)
- Training Book for the Forester 1 – State Lands
- State Lands Quality Initiatives Memo on improving training

Extern social issues (complaints or conflict records, stakeholder consultation process etc.)



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- Tribal Relations Website(s) (WADNR and SharePoint)
- Commissioner's Tribal Relations Order #201029, 2010
- 2017 Tribal Summit Agenda
- Logger Safety Initiative
- Safety Standards for Logging Operations
- SIC Recommendations for Qualified Loggers
- Forest Land Planning Spatial Layer Info w/public comments
- DNR Social Impact Assessment Summary
- Draft Environmental Impact Statement on Alternatives for Sustainable Forest Management of State Trust Lands in Western Washington and for Determining the Sustainable Harvest Level
- Process: Notifying adjacent landowners re Timber Sale

Environmental and HCVF (chemicals records, HCVF records, etc.)

- DNR SEPA Handbook SharePoint Site
- PO14-008 Old Growth Policy
- PO14-009 Wildlife Habitat Policy
- PO14-010 Watershed Systems Policy
- PO14-011 Riparian Conservation Policy
- PO14-012 Special Ecological Features Policy
- PR14-004-046 Identifying and Managing Structurally Complex Forests to meet Older Forest Targets
- PR14-004-170 Talus Fields
- PR14-006-090 Cohorts, Legacy, Leave Trees
- DNR's Natural Areas Program Information (Sept 2015)
  - Natural Area Preserves locations/descriptions
  - Natural Resource Conservation Areas locations
- Natural Heritage Plan
- DRAFT Special Ecological Features Procedure (March 2015)
- HCP (Habitat Conservation Plan) 1997
- Briefing Paper for Puget Sound Partnership Ecosystem Coordination Board, DNR
- Pesticides and Forestry Fact Sheet, DNR (January 2018)

Management and harvesting operation (management plans, inventory records, harvesting records, etc.)

- DRAFT Environmental Impact Statement On Alternatives for Establishment of a Sustainable Harvest Level for Forested State Trust Lands in Western Washington
- Olympic Experimental State Forest Land Plan
- Land Resource Manager Database
- Timber Sale Contract Clause and Administration Manual (October 2018)
- Timber Sale Logging Plan of Operations form
- Black Diamond Field Package
- Elbe Field Packages
- Snoqualmie Field Packages
- Belfair Field Packages

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Monitoring process (FMU composition/ modification records, invoices and other sales records, environmental KPI records, sub-contractor contracts and KPI, records of member monitoring for group certificate etc.)

- Average annual cut / annual growth for south Puget (growth / yield)
- Land Resource Manager Database
- Sustainable Harvest Calculation 909a & b – South Puget Sound FY18
- Sold Sales in South Puget HCP Planning Unit.....
- Natural Heritage Monitoring / Volunteer / Partnership
- DNR Annual Report 2017
- FSC\_Species\_Volume\_Value\_FY09-FY18.xls
- Silv\_Reports\_for\_FY18\_FSC\_audit\_final.xls

**6.2 - Evaluation results with reference to the FSC referential / standard which have to be evaluated in surveillance audit**

**PRINCIPLE 1: Compliance with law and FSC Principles**

DNR is in compliance with all applicable laws and regulations. The Department carries out a variety of compliance monitoring activities, related to both the Habitat Conservation Plan and the State Forest Practices Act. DNR restricts and controls access to State lands when necessary, using road abandonment, gates and signs. There was no evidence to suggest illegal logging is an issue on the South Puget Planning Unit.

DNR has a law enforcement division charged with monitoring permits, investigating trespass, and wildfire investigation. Data is compiled into a report in Region/ Division Incident Reporting system. DNR law enforcement is responsible for enforcing laws and curtailing illegal activities. There are three law enforcement officers for South Puget Sound that move within the region as needed.

During the field tour auditors viewed a harvest site where DNR worked with landowners to adjust reserves to accommodate issues with the visibility of harvest and still achieve wood supply objectives. DNR manages timber harvests from forested state trust lands in a manner consistent with accepted best practices for sustainability. DNR is a public agency that manages trust lands for benefits of the endowed public institutions. As a public agency DNR does not directly pay property taxes. Private lessees pay leasehold tax and the natural areas program pays 'Payments in Lieu of Taxes (PILT) for NAP and NRCA sites.

The South Puget HCP Planning Unit is one of nine HCP planning units. It is the only unit to be certified to FSC. The State is currently evaluating the value-added of FSC and whether to include additional planning units to the FSC certificate. DNR is not a member of FSC and as such there is no requirement to have all their lands FSC certified.

The Washington Department of Natural Resources is a state agency which is required to abide by all State laws and regulations. These laws and regulations cover all aspects of the FSC Policy for Association (FSC-POL-01-004). The State cannot sign off or endorse the Policy of Association as it relates to an international treaty that has yet to be ratified by the federal government. A minor non-conformance (NC-1) was raised as part of the 2017 recertification audit, at the certification decision-level based on this conflict with law and FSC requirements. At the time of this report, the closure evidence has been submitted to BV (certifying body) for review but the NC is not officially closed. The closure date for this NC is April 8, 2019.

No other non-conformances were identified against this principle.

**PRINCIPLE 2: Tenure and use rights and responsibilities**

The DNR has clear title to the state trust lands, with title deeds and survey records being stored in its Olympia office. There have been no recent disputes over tenure and use rights on the forest. There have been disputes in the past with individual tribes which have been litigated and resolved. Traditional uses (especially for aboriginal peoples) are respected through the Cultural Resources Policy of the agency. The State of Washington has entered into a variety of agreements with aboriginal peoples (e.g. tribes) to protect traditional use

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rights.

Each timber sale is reviewed by the public for input, including from affected indigenous peoples. Meetings are held with local tribes to discuss upcoming activities. DNR's state lands archeologist works with local tribes prior to setting up a timber sale if it is suspected a cultural resource may be present.

No non-conformances were identified against this principle.

**PRINCIPLE 3: Indigenous Peoples' Rights**

Washington DNR maintains government-to-government relations with the 13 federally-recognized Indian Tribes residing in the South Puget Sound HCP planning area. The department recognizes the Tribes' separate rights and authorities and commits to work to resolve problems, and to develop relations at all levels of the department to assure good communication and availability of technical and policy expertise. The Commissioner's order on tribal relations -- *"It is further ordered that DNR staff members are encouraged to resolve mutual issues and concerns with the Tribes whenever possible at the organizational level that is closest to the issue and that has appropriate delegated authority"* has been seen to be well implemented.

DNR works closely with local tribes to ensure measures are taken to protect tribal resources. Auditors were told DNR is working on a shared access agreement with all tribes, to meet legislative requirement for tribal access for hunting, fishing and gathering.

DNR has a tribal relations program that includes annual summit meetings inviting all federal and non-federal recognized tribes within the State of Washington. The DNR has a very strong relationship with aboriginal peoples.

No non-conformances were identified against this principle.

**PRINCIPLE 4: Community relations and worker's rights**

Criteria 4.2; 4.4: DNR has a robust health and safety program that is readily available to all employees. As a state agency health and safety insurance meets all applicable state and federal laws and addresses health considerations for employees and contractors. All contracts include requirements to ensure State and federal health and safety requirements are met. DNR contract administrators oversee contract implementation.

The land management planning process requires DNR to obtain input from the public and other interested parties. The FPA process includes a public review that invites comment on any activity requiring a FPA (e.g. timber harvest or road construction).

**PRINCIPLE 5: Benefits from the Forest**

The South Puget HCP Planning Unit is a significant contributor to the economy with average annual timber revenues of approximately \$23 million and leasing revenues of nearly \$1 million. DNR does not permit export of logs, which reinforces the local economy and favors local producers. The funds generated by resource management are distributed to the various public trusts, which fund statewide construction of public schools, universities, prisons and other state institutions, and fund services in many counties, such as libraries, firefighting, and hospitals.

Harvest sites visited during the audit were found to be efficiently harvested with little marketable timber going to waste. High levels of timber utilization were found throughout the South Puget HCP Planning unit. Down-woody-debris was plentiful on all harvest sites as were standing trees (Figure 2).

No non-conformances were identified against this principle.

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Figure 2: Example of standing trees stubbed and live (clumps and single trees) left after harvesting completed.

**PRINCIPLE 6: Environmental Impact**

The South Puget HCP Planning Unit has an Environmental Impact Statement (2010) (EIS) which is reviewed every ten years by the public prior to approval. Annual reports on HCP(2017 reviewed) address progress towards conservation objectives (Riparian Habitat, Spotted Owl, Marbled Murrelet) adaptive management, silvicultural activities, roads management, land transaction, non-timber management activity, recreational program). The HCP, EIS and Annual reports are available online.

Environmental Impacts of forest management have been addressed at the forest level through the Habitat Conservation Plan and Environmental Impact Assessment. These documents assess potential impacts at a strategic level. At the planning stage for each site, detailed plans are created to identify features that might be impacted by forest operations (i.e. access, harvest, silviculture), and prescriptions are applied to mitigate the impacts. For example, riparian areas and recreational trails are pre-identified and set prescriptions are applied. Pre-harvest boundary marking, and cruising identify most other stand level features (e.g. nests, wet areas) that might have been missed in site documents.

Harvest prescriptions include direction for leave tree retention, soil impact management, and riparian management zones. Habitat features for rare, threatened or endangered species are applied at both the strategic level and in the detailed harvest preparation. Innovative methods to create foraging and dispersal habitat for northern spotted owls are being applied. A lot of thought goes into developing site specific prescriptions to enhance habitat based on existing stand characteristics and developing new methods to achieve a desired forest condition.

The WA DNR SPS Planning Unit is under a Habitat Conservation Plan (HCP) where credible assessments have been made on each of the items. In addition, a SEPA checklist is completed for each timber sale that is proposed. Each item has to be addressed in the SEPA checklist. The Forest Practices Application (FPA) also addresses several of the items when applying for a harvest permit

The State Environmental Policy Act (SEPA) is applied on all timber sales. DNR pre-harvest reviews are conducted for each activity to confirm site conditions and determine environmental liabilities. A review of site records confirmed that impacts are considered before management activities are initiated. Physical inspection on-the-ground confirmed the commitment to “grow” a more natural and less industrial forest. Residual trees were evident on every harvest block and many of these were excellent “habitat” trees. Discussions with DNR staff showed a high level of awareness of strategic direction to maintain and enhance long-term ecological functions. An interview with one contractor confirmed a good understanding of the site specific requirements for riparian and leave tree protection.

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Planning and implementation of forest management activities are directed by a wide range of policies, procedures and recommendations which includes Washington State Forest Practice Rules and Regulations, Forest Practices Habitat Conservation Plan, DNR State Lands Habitat Conservation Plan, Habitat Conservation Plan Riparian Forest Restoration Strategy, Procedures on Silviculture Prescriptions, and SPS Prescription Summaries.

DNR Forest Practices Act requires identification of steep, unstable and highly erodible soils/geologic formations. No significant soil disturbance was observed within the portions of the field sites visited.

There is a considerable effort to promote habitat for RTE species. Suitable stands for potential habitat was identified. Harvest prescriptions are made based on current stand conditions, and the desired future condition to enhance foraging and dispersal habitat. The objective of the HCP is to provide NSO dispersal habitat between suitable nesting habitat on adjacent federal lands. The HCP is also designed to encourage recovery of listed anadromous fish species and the marbled murrelet. Auditors observed how marbled murrelet suitable habitat is identified and protected and how Regional biologists work with field staff to create suitable habitat for Spotted Owl through harvest pattern.

The Natural Heritage Plan identifies species that may be rare or threatened. The Forestry Handbook is an assembly of policies, procedures and guidelines that direct management of resources on State trust lands. One timber sale was reviewed where plant communities identified through the Heritage system led to revised harvest prescriptions and documented through the Land and Resource Management database.

A Westside Old Growth Habitat Index (WOGHI) is used to identify when there is a moderate to high likelihood of old growth on a timber sale. The WOGHI is a screening tool to help identify potential old growth that then needs to be field verified. Every timber sale is screened for presence of old-growth stand structure and age, and for presence of pre-euro-American settlement trees. If potential old-growth forest is identified, a specially trained "old-growth designee" visits to the site to assess the areas. SPS regional office staff know where there is old-growth and have polygons developed.

The Riparian Forest Restoration Strategy (RFRS) is implemented through the procedure that guides land managers in typing streams and wetlands and creates guidelines for buffers on varying water types. The management goal of the RFRS is to contribute to the conservation of other aquatic and riparian obligate species and to restore structurally complex riparian forests

Uncommon habitat is one of the attributes identified to raise habitat to a featured status. Snags, legacy trees, and large down woody debris (LDWD) are routinely left on all harvest areas. DNR retains a minimum of 20 trees per hectare (8 trees per acre) in addition to the riparian areas, which are additional acres that are protected. The auditors observed several harvest units with both clumped and dispersed leave trees. The leave areas were not quantified on sites inspected, but every site had obvious leave trees (20+ per hectare), as well as, peninsular leave areas and riparian areas where all vegetation remained.

Auditors did note that most harvest areas had large debris piles that are not disposed of creating a potential fire hazard and, over time, a loss of productive land. An **OBS-3** is issued for DNR to review this potential loss of productive lands and to explore prescribed burns as a way of reducing fire hazard to urban areas.

Unit retention levels, landscape retention levels and rotation age all combine with unit size to achieve ecological objectives, according to forest ecologists, and the combination of those levels can be varied according to the landscape objective. Regeneration harvest blocks in even-aged stands average 40 acres or less. However, some individual harvest blocks exceed 60 acres. The PSF, which was developed by a qualified team of experts, allows harvest blocks up to 100 acres to reduce edge effect, impact of the forest road network and the number of entries. Clumped and/or dispersed leave trees are required to be left in all harvest units. Most units are under 40 acres and contain wetland protection and/or riparian leave tree areas. In some occasions, these riparian function areas are not present and may result in individual unit sizes exceeding 60 acres.

Field staff undertake noxious weed control as budgets allow, working cooperatively with counties and other groups. They work cooperatively with several counties in dealing with noxious weeds. The auditors viewed several planted areas where scotch broom (*Cytisus scoparius*) was present. DNR employs several different techniques to limit the impact of the

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noxious weed on forest stands (e.g. herbicide application, pulling and slashing). To date, DNR has been moderately successful in limiting the impact of this noxious weed on recently planted trees. However, regular monitoring of affected sites, early intervention, continued weed control applications, ongoing research and public awareness and assistance should prove effective.

On most harvest sites viewed on the audit, the predominate native tree species is Douglas Fir (*Pseudotsuga menziesii*) which require large openings for regeneration and vigorous young-stand development. The harvest systems used were found to be appropriate and effective for conifer regeneration. Plantings enhance diversity by controlling species composition and age distribution. DNR Forest Practices Act has a “green up” size and designation for regeneration opening size and adjacent stand ages.

Surfaced roads are water-barred and generally barricaded. Most roads are gated, and access is restricted for all or part of the year. Designated roads are open to the public for recreation and hunting.

The Washington Forest Practices Act includes regulations related to water quality. Most water body protections exceed those of the FSC US Forest Management standard. The DNR exceeds the Forest Practices Act requirements in many situations and has an excellent program of water quality protection. Stream crossings are designed for the 100-year flood event. The South Puget Unit has a list of all crossings that are fish barriers and has undertaken their removal or replacement. Auditors did note two instances of unstable banks that could result in soil running into adjacent water courses and have issued **OBS-4** under Principle 8 to address this isolated issue.

DNR undertakes some ground and hand herbicide applications on a small percentage of the ownership. Herbicides are used to either prepare sites for regeneration or to release trees from vegetative competition. DNR did not apply any herbicides in FY2018.

No non-conformances were identified against this principle.

**Principle 7:**

Not Audited.

**PRINCIPLE 8: Monitoring and Assessment**

Washington DNR has a robust system for monitoring activities, resources and forest conditions. A new forest inventory has been prepared for use in the upcoming allowable cut calculation and the new forest management plan. Forest operations are monitored through the Land and Resource Manager (LRM) system which is a repository for all management information for a stand or site.

Various monitoring systems are in place to evaluate the implementation and effectiveness of its management activities. Regular harvest and road inspections are carried out by DNR staff. It was noted in two instances that the ditch had not stabilized, and soil material was running down the ditch. A heavy rain has the potential for soil material to enter adjacent watercourses and, as a result, an **OBS-4** has been issued to correct this isolated issue. The LRM database contains all the information for each stand within the FMU. The LRM report records salvage and other unexpected removals. Past events for each stand are recorded, including any removals due to catastrophic events. Natural areas are monitored with results recorded. Intensive Management Foresters record stands with invasive species, specifying the type of invasive, if it has been treated and how it was treated. Harvest activities are monitored with results recorded on a harvest inspection form. The agency wildlife biologists monitor the results of habitat enhancement harvests to ensure it meets NSO requirements.

The DNR also monitors rare threatened and endangered (RTE) species through the Habitat Conservation Plan (HCP) which is directed at 8 key RTE species. DNR staff regularly report on progress toward meeting HCP objectives. The implementation monitoring program covers many of the HCP objectives including no harvest areas and buffers.

DNR has a detailed chain of custody system for its timber. This includes special load tickets and contract specifications.

No non-conformances were identified against this principle.

**PRINCIPLE 9: Maintenance of high conservation value forests**

A well developed program is in place to monitor HCV attributes and corrective actions available if in fact, monitoring results indicate an adjustment is required to better maintain or enhance the attribute. The Services are very involved in the monitoring process and will

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follow-up if adjustments are required. Implementation and effectiveness monitoring exist and is robust for HCVFs.(i.e. northern spotted owl, salmon and marbled murrelet) found in the HCP. In NRCAs and NAPs, monitoring program objectives and standards are described. WDNR personnel and cooperators visit sites frequently to monitor the sites and activities. Auditors viewed tools developed by the Region Biologist that assists field staff in the identification of marbled murrelet habitat. No non-conformances were identified against this principle.

**PRINCIPLE 10: Plantations**

Not audited.

**6.3 - Result regarding the correction of Non-Conformities (NC)**

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n°	Indicator	Status	Date recorded	Text of the NC	Objective Opening evidence and justification of their classification of major or minor	Closure deadline required	POTENTIAL NEW STATUTE	Closure evidence or remaining non-conformities	Closure date
1	1.6a	MINOR	9/04/18	The State of Washington is unable to sign the current Policy of Association Declaration (FSC-POL-01-004) due to conflicts with their legislative mandate and the constitutional rule of law.	The Washington Department of Natural Resources is a state agency which is required to abide by all State laws and regulations. These laws and regulations cover all aspects of the FSC Policy of Association (FSC-POL-01-004). The State cannot sign off or endorse the Policy of Association as it relates to an international treaty that has yet to be ratified by the federal government.	9/04/19		Washington DNR continue to analyze the potential legal consequences that signing the PfA/Annex C might have for operations, certificate, and stakeholders. Between now and the Washington DNR's 2018 FSC audit, the agency will seek further information. <ol style="list-style-type: none"> <li>1. What is the expected release date of the Policy for Association, Version 3?</li> <li>2. Engage the State Attorney General's office, DNR executive management, and/or staff experts as needed to re-evaluate previously identified concerns associated with the HCVF and ILO language in the existing PFA.</li> <li>3. If Version 3 of the PfA is released, consult with the</li> </ol>	11/11/18





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n°	Date recorded	Text of the OBSERVATION	Objective Opening evidence	Status (closed, still open, upgraded to minor NC)	Evidences for closure
1	31/10/17	The Department should consider a more extensive monitoring program that documents the extent of Scotch broom on WDNR land and the impacts it may be having on stand dynamic. (6.3h).	Scotch broom observed at several field sites. Observation refers to 1 of 4 elements within this Indicator. Currently, monitoring occurs during planning and onsite operations. The observation is meant to suggest a broader more pro-active monitoring. It must be realized that scotch broom is now endemic in Washington and cannot be eradicated as it is found throughout the State and control can only be achieved with heavy annual herbicide treatments.	Closed.	Scotch broom currently occurs on less than 2% of the certified forest. Monitoring is conducted by the Regional Intensive Management Forester annually. When extensive scotch broom is found the site is scheduled for removal by hand. DNR contributes to research into control measures and public assistance on private lands. The Washington State Department of Agriculture maintains a list and information on noxious weeds that provides identification information and control measures. <a href="https://www.nwcb.wa.gov/weeds/scotch-broom">https://www.nwcb.wa.gov/weeds/scotch-broom</a> Auditors observed results of hand removal of the scotch broom on planted areas and were told herbicide treatments only last 2 years at most. From the evidence, DNR is monitoring and taking measures to control the impact of scotch broom on plantations.
2	31/10/17	The agency should change the language in G115 of the harvesting contract to ensure the units considered as FSC certified are identified (8.3a).	Logging contract template	Closed.	Logging contracts have been updated to identify if harvest contracts are in an FSC-certified area.

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## 7 - Result of surveillance evaluations

MAIN ASSEMENT DATE	
Number of NC closed	
Pending NC	
New NC raised	Washington DNR-499224-US.2742601 – FSC FM- SF02-NC1
Certification Decision (+File names and storage location of Non-Conformities)	
SURVEILLANCE 1 DATE	
Number of NC closed	Washington DNR-499224-US.2742601 – FSC FM- SF02-NC1_CLOSED
Pending NC	None.
New NC raised	None.
Certification Decision	
SURVEILLANCE 2 DATE	
Number of NC closed	
Pending NC	
New NC raised	
Certification Decision	
SURVEILLANCE 3 DATE	
Number of NC closed	
Pending NC	
New NC raised	
Certification Decision	
SURVEILLANCE 4 DATE	
Number of NC closed (+File names and storage location of Non-Conformities)	
Pending NC	
New NC raised	
Certification Decision	

### 7.1 - Synthesis on the conduct of the audit and closing meeting

The results of the surveillance audit were presented to the Certification Manager and key management staff at the closing meeting. There were no non-conformances identified during the conduct of the audit resulting in a very positive audit outcome. There was discussion regarding NC-1 (Policy for Association). DNR presented evidence of completing all relevant deliverables from the approved corrective action plan, but the agency is concerned that the minor non-conformance might be elevated to a major non-conformance if NC-1 is not closed before April 8, 2019. This NC was closed on November 11, 2018.

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**8 - Records of Non-Conformities and observations and new ones raised during the audit**

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**8.1 - Records of Non-Conformities**

*New Non-Conformities raised during the audit, or pending Non-Conformities:*

n°	Indicator	Status	Date recorded	Text of the NC	Objective Opening evidence and justification of their classification of major or minor	Closure deadline required	POTENTIAL NEW STATUTE	Closure evidence or remaining non-conformities	Closure date
		MAJOR							
		MINOR		None					

**8.2 - Records of observations**

*New observations raised during the audit, or pending*

n°	Date recorded	Text of the OBSERVATION	Objective Opening evidence
3	11/10/18	6.3.i – Slash piles accumulation presents a fire hazard.	Observation triggered by discussions during the field audit around a landowner asking to have slash pulled back from edge of property because of fire risk. Observations during the audit noted slash being piled on site but not being burnt. Discussions with staff suggest there is interest in prescribed burning debris piles. Auditors noted the potential for loss of productive landbase over time (areas regenerate slower). Auditors noted logistics issues with carrying out burning near urban areas, but that prescribed burning might assist in reducing the fire hazard debris piles create.
4	11/10/18	8.2.d.1 – In a Type 4 watercourse observed small slump of soil with potential to end up in water channel.	Observations during the audit in 2 different locations and discussions around bank stabilization has prompted this observation. The lack of soil stabilization will result in soil material running into the watercourse in the next heavy rain. This situation must be corrected and monitored. Two examples were observed (on the approach to a temporary bridge on West Tiger Mountain and a new road in the Double Span timber sale Unit 2, Black Diamond Unit).

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## 9 - Proposals regarding the certification decision

### 9.1 - Proposal of conclusion on whether the candidate entity achieved or not the required level of conformance

The certificate holder is in continued conformity with the certification requirements.  
The certificate should be maintained.

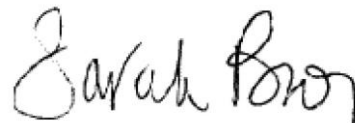
## 10 - Certification decision

The HUB decides that the FSC FM certificate of the Washington State Department of Natural Resources: South Puget HCP Planning Unit remains valid.

Issued the May 22, 2019, reviewed the 27.05.2019

FM certification technical manager,

Lead Auditor,



Krzysztof Wypij

Sarah Bros

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## 11 - Appendices

- A. CV of the members of the audit team
- B. Checklist(s)
- C. Copy of the non-conformity form(s)